



File Code: 1910

Date: February 19, 2013

Dear Interested Citizen:

This letter is to inform community members and interested parties of the Roadside Hazard Tree Removal Project (RHTP) I am proposing on the Nez Perce Clearwater National Forest ([see enclosed vicinity map](#)). The project responds directly to the need to reduce threats to Forest visitors and employees by removing fire damaged and otherwise weakened trees on approximately 1,733 acres located 200 feet on either side of National Forest system (NFS) roads impacted by the 2012 wildfires. While this project is intended to address potential hazards along many of the roads open to the public or used for administrative purposes within the fire perimeters, it will not address all of the roads. The roads identified for treatment have been decided by frequency of use and accessibility.

The Sheep Fire (Salmon River Ranger District), McGuire Complex (Red River Ranger District), and Fern Fire (Powell Ranger District) that occurred in 2012 resulted in hazardous tree conditions on approximately 50 miles of NFS roads (see enclosed project proposal maps). Trees that are dead or dying, including from fire mortality, damage (crown, root, and bole scorch), beetle-infestation, defoliation from spruce budworm, as well as other existing dead trees would be targeted for removal. Trees that do not pose a hazard to people or property would be retained. After felling, trees could be left on site, bucked to reduce fuel hazard, decked along the road, and/or removed from the area. When possible, merchantable trees would be sold to offset the cost to implement the project. There would be no permanent or temporary roads or landings constructed.

Federal OSHA regulations regarding requirements for protecting employees in the course of their work apply to federal agencies. The OSHA "General Duty" standard (29 CFR 960.8) requires agencies to, "...furnish to each employee employment and a place of employment which are free from recognized hazards that are causing or likely to cause death or physical harm" (4). Trees with characteristics that indicate instability are considered recognized hazards. Federal agencies are required to identify trees that pose a danger to employees and establish means of protecting employees from that danger.

The RHT project responds to the goals and objectives of the Nez Perce National Forest Land and Resource Management Plan (NPNF LRMP) (1987) and the Clearwater National Forest Land and Resource Management Plan (CWR LRMP) (1987). Comparison of existing condition and the desired condition as prescribed by the LRMPs indicates a need to address the undesirable resource conditions resulting from the Sheep, McGuire Complex, and Fern Fires. Specific goals set forth in the Nez Perce/Clearwater LRMPs pertaining to this project are as follows:

- Ensure public and firefighter safety by: a) reducing the risk of persons or property being struck by falling trees on approximately 1,733 acres; and b) keeping travel corridors open with adequate clearance for the combination of traditional firefighting equipment (e.g., heavy equipment transport trucks, crew carriers, busses, and fire engines), recreational vehicles, and automobiles.
- Goal 12 of the Clearwater Forest Plan which states; "locate, design and manage forest roads to meet resource objectives and public concerns and to provide optimal soil and watershed protection," and

Goals 12 and 23 of the Nez Perce Forest Plan which state:



- Goal 12 “provide a stable and cost efficient transportation system through construction, reconstruction, maintenance, or transportation system management.”
- Goal 23 “provide administrative sites and facilities that effectively and safely serve the public and accommodate the workforce.”

Table1. Roads identified for hazard tree removal.

Sheep Fire		McGuire Complex Fire	
Road Numbers	Miles	Road Numbers	Miles
441	2.5	1150	2.5
9300	2.5	1194	0.25
9300A	1.5	1190	2.0
2038	4.5	1190B	1.5
2038E	1.0	1190B1	0.2
2038H	1.0	1190B2	0.3
2038I	0.25	222	5.0
9303	4.5	1188	3.0
9303C	0.5	9535	≤ 6
9303E	0.2	9505	≤ 6
9303F	0.5		
9303G	1.0		
9303I	0.5		
9306	0.2		
Total	20.65 miles	Total	26.75 miles

Resources Considerations:

Idaho Roadless Rule

In 2008, the Idaho Roadless Rule (36 CFR 294 Subpart C), passed after the 1987 Forest Plans for both Forests, established management direction for the roadless areas in Idaho. The Rule designates 250 Idaho Roadless Areas (IRAs) and establishes five management themes that provide prohibitions with exceptions or conditioned permissions governing road construction, timber cutting, and discretionary mineral development. Areas designated in Idaho Roadless have been identified in the RHT project.

Table 2. Acres proposed for treatment per fire to show the number of acres inside and outside of Roadless

Project Area	Road Treatment Acres	Treatment Acres In Roadless Areas (Backcountry Restoration Only)	Treatment Acres Outside of Roadless
Fern	206	206	0
Sheep	813	45	768
McGuire	627	21	606
Total	1,646 acres	272 acres	1,374 acres

The Idaho Roadless Rule divided the roadless areas into five broad management themes, three of which pertain to this project:

- **Wild Land Recreation** – These lands generally exhibit outstanding roadless characteristics and are often the same areas recommended as wilderness in existing plans. Road construction, road reconstruction, timber cutting, sale, or removal, and mineral activities are generally prohibited (36 CFR §294.23(a), §294.24(a), §294.25(c)).
- **Primitive** – Prohibits road construction and reconstruction unless needed by statute, treaty, or other rights (36 CFR §294.23(a)). It also prohibits timber cutting, sale or removal except in three limited situations and for personal and administrative use (36 CFR §294.24(b)).
- **Backcountry/Restoration** – Under certain situations, the BCR theme permits road construction, road reconstruction, and timber cutting, sale, or removal (36 CFR §294.23(b), §294.24(c), and §294.25(d)). In particular, the Rule permits temporary road construction and timber harvest to reduce hazardous fuels within a community protection zone (CPZ)(36 CFR §294.23(b)(2) and §294.24(c)(i)).

In addition, the proposal includes treatments in Forest Plan Special Areas (FPSA). These are lands identified on the Idaho Roadless Rule Maps, but are managed in accordance with local Forest Plan (36 CFR §294.28(f)). These lands include, for example, research natural areas, designated and eligible wild and scenic river corridors, and developed recreation sites (Forest Service 2008, Volume 2, pp.Q-1 and Q-2). The Idaho Roadless Rule does not impose any additional management direction or restrictions on FPSAs.

The specific Idaho Roadless Area management themes have been identified by fire and by acre to clarify allowable treatments. Only acres within the Back Country Restoration Roadless Theme will be treated.

Table 3. Idaho Roadless Areas, management classification (theme), by fire area.

Idaho Roadless Area	Management Classification	Fern Fire (acres)	McGuire Complex (acres)	Sheep Fire (acres)
North Fork Spruce-White Sand IRA	Wild Land Recreation	1,114		
	Primitive	2,230		
	Backcountry/Restoration	7,019		
Sneakfoot Meadows IRA	Primitive	106		
	Backcountry/Restoration	750		
	Forest Plan Special Area	49		
Dixie Summit-Nut Hill IRA	Backcountry/Restoration		2,513	
	Forest Plan Special Area		27	
Gospel Hump IRA	Backcountry/Restoration		2,581	
John Day IRA	Backcountry/Restoration			415
Little Slate Creek IRA	Backcountry/Restoration			1,061
Little Slate Creek North IRA	Backcountry/Restoration			2,451
	Forest Plan Special Area			823
Not Roadless		118	17,386	6,790

Based on the nature of the proposed activities and current post-fire condition of the following resources; site-specific considerations will be taken to implement this project.

- Soils: already impacted by wildfires will be assessed using the Regional Soils protocol which states no mechanized equipment will be used on units identified as having greater than 15 percent detrimental disturbance by combining the results of existing soil condition post-fire and the implementation of activities needed to accomplish the project.
- Hydrology: No log removal will take place in Riparian Habitat Conservation Areas (RHCAs) to protect downstream water quality and PACFISH protocol. Identified hazard trees will be felled to provide for safety.
- Cultural: Activity areas will be surveyed prior to implementation. Additionally, during implementation if a cultural site is identified or otherwise in question, activities will cease and a qualified Archaeologist will be notified. SHPO has reviewed a draft MOA and indicated a willingness to accept it once we formally approach them in consultation, then consultation package to SHPO for a 30 day review.
- Visual Quality Objectives (VQOs) as stated in the Forest Plans for hazard tree removal will be utilized in the project design features.
- No new permanent or temporary roads or landings will be constructed for this project.

Opportunity to Comment:

The Nez Perce Clearwater National Forest interdisciplinary team (IDT) is in the process of compiling and analyzing information to write an environmental assessment (EA).

The public is encouraged to take part in the environmental process for the Roadside Hazard Tree Project by submitting written or oral comments on the proposed action or visiting with Forest Service officials. Comments will be accepted for up to the close of business on the 15th day following publication in the Lewiston Tribune. Written comments are to be sent with attention to Mark Craig, Salmon River District Ranger at 304 Slate Creek Drive White Bird, Idaho 83554. To submit comments electronically please put Roadside Hazard Tree Project in the subject line and send to comments-northern-nezperce@fs.fed.us. To fax your comments call 208-839-2730. Be advised comments submitted become part of public record. This project will follow the regulations specified under the 36 CFR 215 subpart A on the National Forest Service website at: <http://www.fs.fed.us/emc/apple/36cfr215a.pdf>.

For more information on this project, contact Sharen Parker, Team Leader at sparker@fs.fed.us.

Sincerely,

/s/ Mark D. Craig
MARK CRAIG
Acting District Ranger

Enclosures: Maps (vicinity and project)